

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

-----x  
IN RE: : Chapter 11  
:   
CIRCUIT CITY STORES, et al. : Case No. 08-35653 (KRH)  
:   
Debtors. : Jointly Administered  
:   
-----x

**MOTION OF PIONEER ELECTRONICS UNDER FED. R. BANKR. P. 3020(a)  
FOR ORDER REQUIRING CONFIRMATION DEPOSIT**

Pioneer Electronics, Inc. (“Pioneer”), by counsel, moves this Honorable Court for an Order in the form accompanying this motion to require the establishment of a confirmation escrow account in connection with the Debtors’ First Amended Joint Plan of Liquidation.

As grounds for and in support of this motion, Pioneer submits the accompanying memorandum of points and authorities.

Respectfully submitted,

PIONEER ELECTRONICS, INC.

by: /s/ William Daniel Sullivan  
Counsel

William Daniel Sullivan (VSB #17493)  
Butzel Long Tighe Patton, PLLC  
1747 Pennsylvania Ave., N.W. Suite 300  
Washington, D.C. 20007  
Tel: 202-454-2850  
Fax: 202-454-2805  
Counsel for Pioneer Electronics, Inc.

**Certificate of Service**

I hereby certify that true copies of the foregoing motion and the accompanying memorandum of point and authorities and proposed order were mailed, first-class postage prepaid, this 4th day of November 2009 to the Office of the United States Trustee, 600 East Main Street, Suite 301, Richmond, VA 23219, and served on all other parties entitled to notice hereof by electronic copies hereof delivered through the Court's ECF system.

/s/ William Daniel Sullivan